

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	Case No.: 2:15-mj-00575-GWF
)	
Plaintiff,)	
)	
vs.)	STIPULATION TO CONTINUE
)	PRELIMINARY HEARING
)	(First Request)
DAVID JOSEPH SABA JAN,)	
)	
Defendant.)	

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Nadia Ahmed, Special Assistant United States Attorney, counsel for the United States of America, and William Carrico, Assistant Federal Public Defender, counsel for defendant **DAVID JOSEPH SABA JAN** that the preliminary hearing in the above-captioned matter, currently scheduled for July 20, 2015, at the hour of 4:00 p.m., be vacated and continued for thirty (30) days or to a date and time convenient to the Court.

This stipulation is entered into for the following reasons:

1. The parties are trying to resolve this matter which may obviate the need for the preliminary hearing or charging by way of Information.
2. Counsel for the defendant is currently out of the jurisdiction. Additionally, counsel will need additional time to discuss any resolution with the defendant.
3. Defendant is out of custody and does not oppose the continuance.

1 4. Denial of this request for continuance of the preliminary hearing would prejudice
2 both the defendant the Government and unnecessarily consume this Court's valuable resources,
3 taking into account the exercise of due diligence.

4 5. Additionally, denial of this request for continuance could result in a miscarriage
5 of justice.

6 6. The additional time requested by this stipulation, is excludable in computing the
7 time within which the defendant must be indicted and the trial herein must commence pursuant
8 to the Speedy Trial Act, 18 U.S.C. § 3161(b) and § 3161(h)(8)(A), considering the factors under
9 18 U.S.C. § 3161(h)(8)(B)(I) and (iv).

10 7. There have been no previous requests for continuance of the preliminary hearing
11 granted herein.

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13 DATED this 16th day of July, 2015.

14
15 Respectfully submitted,

16 DANIEL G. BOGDEN
17 United States Attorney

18 /s/ William Carrico
19 WILLIAM CARRICO
20 Counsel for defendant
21 **DAVID JOSEPH SABAJAN**

22 /s/ Nadia Ahmed
23 NADIA AHMED
24 Special Assistant United States Attorney

UNITED STATES OF AMERICA,)	Case No: 2:15-mj-00575-GWF
)	
Plaintiff,)	
)	ORDER CONTINUING
vs.)	PRELIMINARY HEARING
)	
DAVID JOSEPH SABAJAN,)	
)	
Defendant.)	

IT IS HEREBY ORDERED that the preliminary hearing in the above-captioned matter currently scheduled for July 20, 2015, at the hour of 4:00 p.m., be vacated and continued to August 20, _____, 2015, at the hour of 4:00 p.m.

George Foley Jr.
UNITED STATES MAGISTRATE JUDGE